

# JUSTIN C. BONUS, ESQ.

ATTORNEY AT LAW

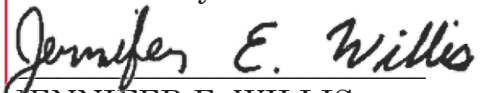
JUSTIN C. BONUS, ESQ.  
JUSTIN.BONUS@GMAIL.COM

118-35 QUEENS BOULEVARD, SUITE 400  
FOREST HILLS, NY 11375

TEL. (347) 920-0160  
FAX: (888) 237-8686

The Honorable Jennifer E Willis  
Magistrate Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The request is GRANTED. The Court is not likely to entertain further extensions absent extraordinary circumstances. SO ORDERED.

  
JENNIFER E. WILLIS  
United States Magistrate Judge  
May 16, 2024.

**Re: Joseph Sanchez v. Thomas Griffin**  
**Docket Number: 1:16-cv-06433-ER-JW**

Dear Honorable Willis:

As you know, this office is counsel to Petitioner, Joseph Sanchez, in the above-captioned matter. We write this letter to respectfully request an extension to file Mr. Sanchez's amended petition and memorandum of law.

This is Mr. Sanchez's first request for an extension. Here, there is an extensive appellate and post-conviction procedural history, along with several claims that Mr. Sanchez was subjected to substantial due process violations.

Additionally, I am scheduled to be in a hearing on May 20, 2024 through May 22, 2024 in St. Louis, MO on a post-conviction motion on a case (Christopher Dunn) from 1990 and then on June 4, 2024 through June 6, 2024, I will be involved in a bench trial in Louisiana, involving an innocent man's (Vincent Simmons) claims that he is entitled to state compensation for serving almost 45 years in prison based upon his wrongful conviction.

As such, I respectfully request a 45-day extension to file Mr. Sanchez's amended petition and memorandum of law. I have conferred with opposing counsel, and he does not object.

Please feel free to contact me if you have any questions or need further information.

Thank you for your consideration of Mr. Sanchez's request.

Sincerely,

JUSTIN C. BONUS, ESQ.  
Attorney at Law

/s/ Justin Bonus  
JUSTIN BONUS, ESQ.

cc; VIA ECF

T. Charles Won  
Assistant District Attorney  
Bronx County District Attorney's Office  
Appeals Bureau  
198 E. 161st Street  
Bronx, NY 10451